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Other rules, however, have been adopted in other jurisdictions. For instance, the cost of re-seeding the meadow, and its rental value until it is restored to its former condition have been allowed. *Railway Co. v. Jones*, 59 Ark. 105, 26 S. W. 595; *The P., C. & St. L. Ry. Co. v. Hixon*, 110 Ind. 225, 11 N. E. 285. The market value of the crop when matured, less the cost of producing, harvesting, and marketing, has sometimes been recovered. *Smith v. Railroad Co.*, 38 Iowa 518; *Shotwell v. Dodge*, 8 Wash. 337, 36 Pac. 254. In addition to the value of the crop destroyed, plaintiff has been permitted to receive (1) the cost of restoring the meadow to its former condition, *Bradley v. Iowa Central Ry. Co.*, 111 Iowa 562, 82 N. W. 996; (2) compensation for services in preventing further injury, *Mo. Pac. Ry. Co. v. Ricketts*, 45 Kan. 617, 26 Pac. 50; (3) interest on the value from the time of destruction until verdict, *Clark v. Bank*, 6 Houst. (Del.) 584; *Lampley v. Atlantic Coast Line R. R. Co.*, 63 S. C. 462, 41 S. E. 517. In case of a permanent injury to the land the difference in value of the premises before and after the fire may be recovered. *Wiggins v. Railroad*, 119 Mo. App. 492, 95 S. W. 311; *F. W. & N. O. Ry Co. v. Wallace*, 74 Tex. 581, 12 S. W. 227. But in the principal case plaintiff could get nothing for injuries to the inheritance because he was only lessee and therefore had no interest in it.

EVIDENCE—ADMISSIBILITY OF A DEED AS AN ANCIENT DOCUMENT.—Defendant offered in evidence a deed, as an ancient instrument. It was shown to be more than thirty years old and one of a kind which the law required to be kept in the public archives. But it was found among the papers of one of the grantees in possession of his daughter. *Held*, that this deed could be admitted as an ancient instrument. *Frugia et al. v. Trueheart et al.* (1908), — Tex. Civ. App. —, 106 S. W. Rep. 736.

One of the requirements in order that such an instrument can be admitted without proof of execution, is that it be found in a proper custody. *Whitman v. Heneberry*, 73 Ill. 109; *Whitman v. Shaw*, 166 Mass. 451. But a proper custody need not be the usual one, as was said in *Croughton v. Blake and others*, 12 M. & W. 205. In order to render a written document admissible it is not necessary to show that it has come from the most proper custody. *Bishop of Meath v. Winchester*, 3 Bing. N. C. 183. It is sufficient if it comes from a place where it might reasonably be expected to be found. What is proper custody is a question for the court. *Rees v. Walters*, 3 M. & W. 527.

EVIDENCE—ADMISSIONS IN PLEADING.—Defendant offered as an admission the reply of the plaintiff, which had later been amended by cutting out the allegation containing the admission. *Held*, the part removed from the pleading by the amendment is out of the case and cannot be treated as an admission of the party pleading it. *Kersten v. Weichman et al.* (1908), — Wis. —, 114 N. W. Rep. 499.

The decision can hardly be reconciled with the former Wisconsin case of *Norris v. Cargill*, 57 Wis. 251. It is in harmony with *Smith v. Davidson*, 41 Fed. 172; *Holland v. Rogers*, 33 Ark. 251; *Mecham v. McKay*, 37 Cal. 154;